

1 **TANIA ROSE 151514**  
2 **ROSE COUNSEL**  
3 2014 Virginia Street  
Berkeley, California 94709  
3 Telephone: (510) 435.0250

4 Attorneys for Plaintiff  
RAY RODRIGUEZ

5 **S. BRETT SUTTON 143107**  
6 **JARED HAGUE 251517**  
7 **SUTTON HAGUE LAW CORPORATION, P.C.**  
8 5200 N. Palm Avenue, Suite 203  
Fresno, California 93704  
8 Telephone: (559) 325-0500  
Facsimile: (559) 981-1217

9 Attorneys for Defendant  
10 SAPUTO CHEESE USA INC.

11 **UNITED STATES DISTRICT COURT**  
12 **EASTERN DISTRICT OF CALIFORNIA**

13 \* \* \*

14 RAY RODRIGUEZ,

15 Case No. 1:24-cv-00838-KES-BAM

16 Plaintiff,

17 vs.  
18 SAPUTO CHEESE USA, INC., and DOES 1 –  
10,  
19 Defendants.

**PLAINTIFF AND DEFENDANT'S  
STIPULATION TO EXTEND NON-  
EXPERT DISCOVERY DEADLINE;  
[PROPOSED ORDER]**

20  
21 Complaint Filed: June 20, 2024  
22 Removal Date: July 19, 2024  
23 Trial Date: January 26, 2027

24 Plaintiff Ray Rodriguez and Defendant Saputo Cheese USA, Inc. (collectively, "the Parties"), by  
25 and through their respective counsel of record, hereby agree to enter into the following Stipulation  
26 to extend the discovery cut-off. Good cause exists for a short extension.

1 WHEREAS, the discovery in this case is ordered to be completed no later than December 12, 2025  
2 (see ECF No. 13);  
3 WHEREAS Plaintiff wishes to depose several of Defendants' agents and a Person Most Qualified  
4 whom he has not yet made been able to depose;  
5 WHEREAS the Parties are in the process of meeting and conferring about prospective dates for  
6 the remaining depositions Plaintiff wishes to take;  
7 WHEREAS, the Parties' stipulated extension of the Non-expert Discovery Cutoff will not  
8 necessitate the extension of any other dates in the Court's Scheduling Order at ECF No. 13,  
9 including the trial date, and therefore will not delay the ultimate resolution of this case;

10 JOINT STIPULATION

11 By this Joint stipulation, Parties agree to the following:

- 12 1. The Parties agree to extend the Non-expert Discovery Cut-Off to February 15, 2026.
- 13 2. No Party will suffer prejudice as a result of the aforementioned extension in view of the  
trial date set for early 2027.
- 14 3. All parties have stipulated to the joint extension.
- 15 4. The Parties respectfully request that the Court enter the [Proposed] Order pursuant to the  
terms of this Stipulation.

16 IT IS SO STIPULATED.

17 DATED: November 18, 2025

18 ROSECOUNSEL

19  
20 /s/ Tania Rose  
TANIA ROSE  
21 Attorneys for Plaintiff  
RAY RODRIGUEZ

22 DATED: November 18, 2025

23 SUTTON HAGUE LAW CORPORATION, P.C.

24  
25 /s/ Brady Briggs  
BRETT SUTTON  
JARED HAGUE  
26 BRADY BRIGGS  
Attorneys for Defendant  
27 SAPUTO CHEESE USA, INC.  
28

## ORDER

Pursuant to the parties' Stipulation, and good cause appearing, the Court orders the following:

1. The Non-expert Discovery Cut-Off, currently set for December 12, 2025, is extended to February 15, 2026.
  2. Any further request for an extension of time must be supported by good cause, which will be narrowly construed.

IT IS SO ORDERED.

Dated: November 19, 2025

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE